

JTM/PEB/USAO # 2013R00303

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

2013 OCT 25 A 10:32

UNITED STATES OF AMERICA

: CRIMINAL NO. JFM-13-0589

v.

: (Conspiracy To Commit Interstate
: Transportation of Stolen Motor Vehicles, DEPUTY
: 18 U.S.C. § 371; Aiding and Abetting, 18
: U.S.C. § 2)

ERIC OLANIYAN,

Defendant.

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INFORMATION

(Conspiracy to Commit Interstate Transportation of Stolen Motor Vehicles)

The United States Attorney for the District of Maryland charges:

Introduction

At all times material to this Indictment:

1. Defendant **ERIC OLANIYAN** ("OLANIYAN") was a resident of Laurel, Maryland.

The Conspiracy

2. From on or about January 31, 2013 through on or about April 22, 2013, in the District of Maryland and elsewhere, the defendant,

ERIC OLANIYAN,

did knowingly and intentionally combine, conspire, confederate and agree with others known and unknown to commit interstate transportation of stolen motor vehicles, an offense against the United States, to wit: to unlawfully transport in interstate commerce stolen motor vehicles from the States of New Jersey and New York and the District of Columbia to the State of Maryland with the

intent of shipping said stolen vehicles to the country of Nigeria, knowing the same to be stolen, in violation of 18, United States Code § 2312.

MANNER AND MEANS OF THE CONSPIRACY

3. From at least January 31, 2013 through on or about April 22, 2013, **OLANIYAN**, the defendant, and others known and unknown, engaged in a scheme to steal vehicles from various locations in Maryland, New Jersey, New York, Washington, D.C., and elsewhere, and then transport those stolen vehicles to Nigeria, using international shipping companies.

4. It was further part of the conspiracy that **OLANIYAN**, the defendant, and others known and unknown, caused cars to be stolen from individuals in Maryland, New Jersey, New York, Washington, D.C., and elsewhere.

5. It was further part of the conspiracy that after causing the vehicles to be stolen, one or more of the conspirators would transfer possession of the vehicles to **OLANIYAN**.

6. It was further part of the conspiracy that after causing the vehicles to be stolen, one or more of the coconspirators would transport the stolen vehicles to a "cooling off" location. **OLANIYAN** and others known and unknown would then cause the stolen vehicles to be loaded into a shipping container, and would further arrange for a truck driver to transport the shipping container with the stolen vehicles to the Port of Baltimore, Maryland.

7. It was further part of the conspiracy that **OLANIYAN** and others known and unknown would arrange for the stolen vehicles to be shipped by way of a cargo ship from the Port of Baltimore, MD, to Lagos, Nigeria.

8. It was further part of the conspiracy that **OLANIYAN** and others known and unknown, in an effort to conceal that the cars they sought to ship had been stolen, presented false and fraudulent title information to the Shipping Company.

OVERT ACTS

9. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the District of Maryland and elsewhere:

Stolen 2013 Land Rover Range Rover

a. On or about January 31, 2013, conspirators not named as defendants herein, stole a 2013 Land Rover Range Rover from a victim in Washington, D.C.

b. Between on or about January 31, 2013 and on or about April 12, 2013, the 2013 Land Rover Range Rover was delivered to **OLANIYAN** in Maryland. For a fee, **OLANIYAN** was to arrange the loading and transporting of the 2013 Land Rover Range Rover to Lagos, Nigeria.

c. On or about April 12, 2013, **OLANIYAN** and others known and unknown caused the 2013 Land Rover Range Rover to be loaded into a shipping container in Maryland, along with three other stolen vehicles, and arrangements were made to have said container delivered to the Port of Baltimore, MD, for the purpose of shipping the container to Lagos, Nigeria.

18 U.S.C. § 371

10-4-13

Date

Rod J. Rosenstein *JRM*
Rod J. Rosenstein
United States Attorney
District of Maryland